

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DON HOLLAND, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CRYPTOZOO, INC., *et al.*,

Defendants.

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CIVIL ACTION NO.: 1:23-cv-110

HON. ROBERT PITMAN

AFFIDAVIT OF DANIELLE STROBEL

STATE OF COLORADO §
§
COUNTY OF EL PASO §

I, Danielle Strobel, having been duly cautioned and sworn, state as follows:

1. I am over 18 years of age and I am fully competent and qualified to make this affidavit. The facts stated herein are my personal knowledge and are true and correct.

2. I currently live in Colorado Springs, Colorado. I have never lived in the State of Texas.

3. I am 26 years old. I have only traveled to Texas twice in my life. In 2013, I traveled to Texas for a canoeing trip on the Rio Grande River. Once the trip was over, I returned to Indiana, where I was living at the time. In 2020, I was in Texas for less than twenty-four hours to deliver a collectible trading card, for a matter unrelated to CryptoZoo, Inc. or the facts of this case.

4. I have never owned, leased, or held a security interest in any real or personal property in the State of Texas. I have never opened or maintained a bank account in Texas. I have never paid or owed taxes to the State of Texas or any of its political subdivisions.

5. I have never engaged in any business directed at Texas residents. I have never opened or maintained an office or other business of any kind in Texas. I have never hired employees, servants, or agents in Texas, nor have I maintained or been required to maintain a registered agent for service in Texas. I have never maintained a telephone or facsimile number in Texas.

6. Aside from the present case, I have never been a party to a lawsuit in Texas.

7. I have never communicated with Plaintiff Don Holland.

8. I did not draft, revise, sign, or file any of CryptoZoo's organizational documents.

9. I was never a party to, nor did I ever draft, revise, sign, or publish any of the contracts executed by CryptoZoo.

10. I did not draft or revise CryptoZoo's Terms and Conditions or Terms of Service.

11. I never had access to any bank, depository, or investment accounts owned by CryptoZoo.

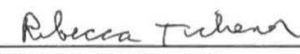
12. Litigating this matter in Texas would be extremely burdensome, time-consuming, and costly to me, in part because I live in Colorado and have no connection to Texas.

Further Affiant sayeth not.



Danielle Strobel

Sworn to and subscribed before me this 17th day of May, 2023.



NOTARY PUBLIC

